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ENTERED		SERVED ON
APRIL 17, 2025		
CLERK, U.S. DISTRICT COURT		
DISTRICT OF NEVADA		
/s/ RJDG DEPUTY		

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

7 SHANA LEE MCCART-POLLAK,
 8 Plaintiff,

9 vs.

10 ON DEMAND DIRECT RESPONSE LLC,
 11 Delaware company, ON DEMAND DIRECT
 12 RESPONSE III LLC, Delaware company;
 BRETT SAEVITZON, individual; CRAIG
 13 SHANDLER, individual; JEFFREY MILLER,
 individual; MARK MEYERS, individual;
 14 DOES I-X; ROE BUSINESS ENTITIES I-
 X;

15 Defendants

Case No: 2:20-cv-01624-GMN-NJK

**JOINT STIPULATION AND ORDER TO
 STAY AND/OR CONTINUE THE DUE
 DATE OF THE JOINT PROPOSED
 PRETRIAL ORDER [ECF No. 291, 296]**

17 Comes now, Plaintiff Shana Lee McCart-Pollak ("Pollak") in proper person;
 18 Defendant Brett Saevitzon ("Saevitzon"); Defendant Craig Shandler ("Shandler"), by and
 19 through their counsel, David K. Dorenfeld, Esq., of Dorenfeldlaw, inc., hereby submit this
 20 **JOINT STIPULATION AND ORDER TO STAY AND/OR CONTINUE THE DUE DATE OF**
 21 **THE JOINT PROPOSED PRETRIAL ORDER [ECF. No. 291, 296]** pursuant to LR 16-
 22 3(b) using form provided in LR 16-4, currently due April 28, 2025, to a later date this
 23 Honorable Court may allow.

26 This stipulation and order is being executed due to multiple Motions that are
 27 pending in the Court, which have a direct impact on the case. The Pending Motions are

1) Pollak has requested a "Show Cause" Hearing [Dkt 302]; 2) Pollak has requested A
"Show Cause" Hearing and Dispositive Sanctions against Brett Saevitzon and Sanctions
against His Counsel [Dkt 300 and 301]; and 3) Pollak has requested Dispositive Sanctions
against Craig Shandler and Sanctions against His Counsel [Dkt 303].

GOOD CAUSE

There is "Good Cause" for the Court to determine the pending motions, as it is consistent with Rule 1 that the rules "shall be construed and administered to secure the just, speedy, and inexpensive determination of every action": The Court could potentially determine that case dispositive sanctions are warranted; which would negate the need for a pretrial order, since there would be NO trial.

At this juncture, for the Court to pause and to determine the pending Motions, WOULD NOT PREJUDICE any of the Parties, as a trial date has not been set. This would save the Parties costs, as well as, the parties and the Court's time. Further, this would allow the parties to focus their time on fully briefing the Motions (Response and Reply) for the Court.

The Parties respectfully requests that the Court stay and/or continue the date the pretrial order is due, while the parties brief and the Court considers the pending motions, the Parties wish to avoid the cost and time in preparing the pretrial report pending resolution of the issues.

This is the second request. The first request was due to a medical emergency. The parties in this matter respectfully request this Honorable Court to stay or extend out the due date of the Joint Proposed Pretrial Order currently due on April 28, 2025, to a later date this Honorable Court may allow.

1 Dated this 17th day of April, 2025

2 

3 SIGNATURE

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9 Pro Se

10 

11 David K. Dorenfeld (Cal Bar No. 145056;
12 *Pro Hac Vice*)
13 DorenfeldLaw, Inc.
14 30101 Agoura Court, Suite 210
15 Agoura Hills, California 91301
16 Tel: (818) 865-4000
17 Fax: (818) 865-4010
18 Email: david@dorenfeldlaw.com
19 Attorney for Defendants, Brett Saevitzon
20 and Craig Shandler

21 Accordingly, the Parties shall file a Joint Pretrial Order 90 days from the date
22 of this Order.

23 IT IS SO ORDERED.
24 

25 Gloria M. Navarro
26 United States District Judge

27 DATED: April 18, 2025.

CERTIFICATE OF SERVICE

I, Shana Lee McCart-Pollak, declares as follows, I am over the age of 18 years:

My address is: 1104 North Woodridge Lane
Liberty, MO 64068
(702) 439-2263

On April 17, 2025, I served the foregoing document(s) described as:

**JOINT STIPULATION AND ORDER TO STAY AND/OR CONTINUE THE DUE DATE
OF THE JOINT PROPOSED PRETRIAL ORDER [ECF NO. 291, 296]**

I hereby certify that on the 17th day of April 2025, a true and complete copy of the foregoing was served on counsel of record by mail to the addresses indicated below:

Dorenfeld Law
30101 Agoura Court, Suite 210
Agoura Hills, California 91301

I declare under penalty of perjury that the foregoing is true and correct.

Shana Lee McCart-Pollak
Shana Lee McCart-Pollak

JOINT STIPULATION AND ORDER TO STAY AND/OR CONTINUE THE DUE DATE OF THE JOINT
PROPOSED PRETRIAL ORDER [ECF NO. 291, 296] - 1